



Stakeholder Consultation Workshop on Standardized Baseline under the Clean Development Mechanism

4-5 September 2011 Radisson Hotel, Kathmandu, Nepal

Comments to "PROCEDURE FOR THE SUBMISSION AND CONSIDERATION OF STANDARDIZED BASELINES" *Initial draft for discussion*

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1. "The use of standardized baselines can potentially reduce transaction costs..." (EB62, Annex 8)

According to the *Procedures*..., The entity submitting the PSB shall initiate the submission of a PSB by uploading the following documentation on the UNFCCC CDM website:

(b) A report prepared by a DOE, selected by the DNA (very likely contracted by PP).

It means that transaction costs may be reduced for next projects, using the approved SB, but not for projects, submitting PSB for approval.

2. Approval of PSB takes long time (about 6 months in best case). The procedure is similar to the procedure of approval of a new baseline and monitoring methodology. Approval of a new methodology very often takes more than 2 years.



By definition, Standardized baseline is

"...a baseline established for a Party or a group of Parties to facilitate the calculation of emission reduction and removals and/or the determination of additionality for CDM project activities, while providing assistance for assuring environmental integrity".

It is unclear, how the Parties will cooperate and how they can clearly identify common problems (need of specific SBs).

Most acceptable way to solve this issue is stated in (*EB62,Annex 8*): CMP 6 also requested the Board to develop standardized baselines, as appropriate, in consultation with relevant designated national authorities (DNAs)...



Thank you for attention!